

# USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority:** Howard-Suamico School District

**Agency Code:** 05-2604

**School(s) Reviewed:** Lineville Intermediate and Bay Port High Schools

**Review Date(s):** January 10 -12, 2017

**Date of Exit Conference:** 1/12/2017

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (School District)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School District meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).
- School District staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- School Districts are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage [dpi.wi.gov/school-nutrition/national-school-lunch-program/financial](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial), scroll down to the unpaid meal charges section.

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the all staff at Howard-Suamico School District for a great administrative review. Everyone was warm, friendly, and responsive to questions, comments, or concerns. The treatment received at both AR sites and the administrative office was very much appreciated. The kitchen staff at both Lineville Intermediate and Bay Port High Schools are doing a tremendous job preparing and serving nutritious meals to students. Everything was well-organized and displayed very nicely. The staff do a great job working efficiently together. The Food Service Director is doing a truly commendable job at going above and beyond with the number of options students have for both

breakfast and lunch as well as a la carte items, all of which meet Smart Snacks standards. Great job and well done to the Food Service Director and Food Service Staff for managing this so well!

The entire food service team is providing excellent customer service. The meals were colorful and appetizing. Strong efforts are being made to plan and implement meals which meet USDA meal pattern requirements. The cafeteria is a classroom where students learn eating behaviors which can last a lifetime and we thank everyone involved for their commitment to child nutrition efforts.

I found the Food Service Program at Howard-Suamico School District to be a stellar program in which the students are fortunate to have access to. In my opinion this Food Service Program is one of the top ones in the State.

## **REVIEW AREAS**

### **Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming**

**The following bullet points are provided only as a reminder,**

#### **Comments/Technical Assistance/Compliance Reminders:**

##### *Certification and Benefit Issuance*

- 508 eligibility determinations were reviewed. The food service secretary has done an outstanding job!

##### *Applications*

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>), you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.
- When benefit's eligibility status increases, the change must take place within 3 days. When benefit's eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.

##### *Zero Income*

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

##### *Household Size Box*

- If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the School District is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before a determination is made.
- If the Total Household Members box has not been completed, the School District is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Any application that does not have this box completed is considered an incomplete application.

#### Incomplete Applications

- Any application which is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The School District may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to be obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

#### Annual Income

- If the household provides only annual income, the school must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

#### Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the School District must confirm the children's status by a program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

#### Application forms

- If a School District wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

#### Effective Date of Eligibility

- School Districts may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

#### Direct Certification

- You are required to run direct certification minimum of three times a year: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February).
- The effective eligibility date for a DC eligible student is the date of the original output file.

### Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The School Districts must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

### Meal Counting and Claiming

- Meals must be offered to all students each day school is in session a full day. DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- The meal counting and claim was conducted perfectly.

## **MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Comments/Technical Assistance/Compliance Reminders:**

#### Technical Assistance:

Documentation: Food manufacturers are continually reformulating products used in schools. It is important to stay current with these changes and be confident that the documentation on file, including Product Formulation Statements (PFS) and USDA Fact Sheets that match the products in stock. These records should be reviewed and updated at least annually as new products are purchased or substituted. Please be sure to discard any outdated crediting information for products that have changed or are no longer purchased. All USDA Fact Sheets can be found here: [USDA Fact Sheets](#).

#### Crediting:

Some of the crediting on the production records as well as the recipes were incorrect. See corrections below. It is important that products are being updated on recipes to reflect what is actually being used as crediting can be different for various products.

- Yogurt Parfait:
  - Grain crediting: 2 oz. eq.; should be 2.25 oz. eq. (1/4 cup granola = 1 oz. eq. grain)
- Salad w/ Chicken BP:
  - Vegetable crediting: 1.75 cups; should be 1.5 cups (due to leafy greens)
  - M/MA crediting: 2 oz. eq.; should be 1.25 oz. eq. if using 2.33 oz. chicken fajita strips
- Salad w/ Ham BP:

- Vegetable crediting: 1.75 cups; should be 1.5 cups (due to leafy greens)
- Salad, Veg BP:
  - Vegetable crediting: 1.75 cups; should be 1.5 cups (due to leafy greens)
  - M/MA crediting: 2 oz. eq.; should be 3 oz. eq. (1 large egg = 2 oz. eq. M/MA)
- Salad, Southwest Chicken
  - Vegetable crediting: 1.75 cups; should be 1.5 cups
  - M/MA crediting: 2 oz. eq.; should be 1.25 oz. eq. if using 2.33 oz. chicken fajita strips

#### Sodium:

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. The use of these products should be closely monitored and limited to meet sodium requirements in this school year and upcoming school years. Although not currently being practiced, the placement and use of salt shakers in the cafeteria is strongly discouraged and will likely put meals over the sodium limits per requirements.

## **RESOURCE MANAGEMENT**

### **Comments/Technical Assistance/Compliance Reminders:**

#### Annual Financial Report:

- All revenues including reimbursements, student payments, and all expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. This will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new 2016-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.

#### Allowable costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment, and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

#### Paid Lunch Equity

- The Paid Lunch Equity tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation.

### Revenue from Non-program Foods

- The Non-program Foods Revenue Rule SP-20-2016 is located on our web site here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
- The Non-program Foods in a nutshell is located on our web site here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
- Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never be negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.
- The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The DPI Non-program Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, School Districts must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to the on-line contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices since rates aren't released until July 1 of each year.

## **GENERAL PROGRAM COMPLIANCE**

### **Comments/Technical Assistance/Compliance Reminders:**

#### Nondiscrimination Statement

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, **“This institution is an equal opportunity provider,”** so that it can be printed in the same size font as the other printing in the document.

#### “And Justice for All Poster”

- We appreciated that the lunch room area had the food safety inspection and the new “And Justice for All” posters posted on the cafeteria wall so the public can read the information.



### Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

### Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

### Special Dietary Needs

- Special dietary accommodations were discussed. If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong that you can use [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special\\_dietary\\_requests\\_form.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf). When the form is completed indicating a special dietary request is based on a disability, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all accommodations must be made according to the USDA's meal pattern requirements in order to claim reimbursement.

### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All School Districts should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A School District may always attempt to resolve a situation that is occurring in real time. However, if an individual states they wish to file a civil rights complaint, the School District must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on website at: [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure this is included in the district procedures to ensure compliance.

#### On-site Monitoring

- Every school year, each School District with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review and 50% of schools approved to participate in the SBP. With each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the School District onsite monitoring section.

#### Local Wellness Policy and School Meal Environment

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy and have an active Wellness Committee. Information on wellness policies may be found at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.
- Local Wellness Policy's should include language related to nutrition education, nutrition promotion, nutrition guidelines available for all foods on campus, physical education, and physical activity.
- School District must inform the public about the content of the local school wellness policy and retain documentation regarding the notification.
- School District must review and update local school wellness policy on a periodic basis (recommended annually). Retain documentation demonstrating how this requirement is met.
- School Districts must permit parents, students, physical education teachers, school health professionals, school administrators, school board representatives of the school district, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy. School district wellness committees should include a diverse team of committed school and community stakeholders.
- School Districts are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation all have been notified of participation availability.
- The School District must conduct an assessment of the implementation of local school wellness policy every 3 years. School districts are required to retain a copy of the assessment on file. The assessment should include the extent to which a school district is in compliance with their Local Wellness Policy; the progress made toward attaining the goals of the LWP; and the extent to which the school district's local wellness policy compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist School Districts to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice-School Wellness Policy Toolkit*: [http://fns.dpi.wi.gov/fns\\_wellnessplcy2](http://fns.dpi.wi.gov/fns_wellnessplcy2).
- The School District is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of the Local Wellness Policy. School districts are required to retain a copy of the assessment and documentation regarding the public notification.



### Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last instructional period, must be in compliance with the new “Smart Snacks” regulation that was effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food and beverage fundraisers must be tracked school district to assure compliance with the regulation. Copies of the tools are available on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The food service department is doing a wonderful job of checking all products they sell for Smart Snacks compliance. This information is organized into a binder to document compliance. Roughly 10% of the products sold by food service were checked, and all were found to be compliant. Great work!

### Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- The hiring standards for school district directors are based on the size of their school district and includes education, school nutrition experience, and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary. This would be an unallowable cost to the non-profit school food service account. The School District’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- Annual training must be job-specific and intended to help employees perform their duties as well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- School Districts should clearly document all required training information and maintain a file including the name of staff person, date hired, title/position, brief list of core duties, responsibilities, status (full, part-time, volunteer, etc.), and professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

<b>Directors</b>	<b>Managers</b>	<b>Other Staff</b>	<b>Part Time Staff</b>
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
<b>8 hours</b>	<b>6 hours</b>	<b>4 hours</b>	<b>4 hours</b>
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
<b>12 hours</b>	<b>10 hours</b>	<b>6 hours</b>	<b>4 hours</b>

### Water

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, water fountain, or a faucet that allows students to fill their own bottles.

### Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan.
- Food safety inspection reports need to be posted in public view.

### Temperatures

- All cooling equipment must have the internal temperature taken and recorded daily on a temperature log.

### Food Safety Plans

- The Food Safety Plan was available for review. The food service staff practices and uses good food handling techniques. All temperature, calibration, and sanitizing solution logs were up to date.
- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures for each individual site, all equipment, food service staff, and be reviewed yearly. Updated prototype food safety plan templates and standard operation procedures may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.
- School Districts are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.
- Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and Standard Operating Procedures.
- All food service employees must have a signed Employee Reporting Agreement on file.

### Time as Public Health Control

- When using "Time as a Public Health (Temperature) Control":

- The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
- Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
- The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc.	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

### Buy American

- The USDA requires that a School District purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy.
- The Buy American provision is required whether food products are purchased by School Districts or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures the bidder is responsive and responsible to the solicitation.
- There are limited exceptions to the Buy American provision, which allow for the purchase of products not meeting the “domestic” standard as described above in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

### Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

### *School Breakfast Promotion Outreach*

- At the beginning of the school year, the School District must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
- Ideas for breakfast promotions would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>.
- A Breakfast in the Classroom Toolkit is also available if that option is considered: [http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC\\_Final-web.pdf](http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf)
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website: <https://www.youtube.com/watch?v=aHR7eECbKaE>
- For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.
  - Cycle Menu Resources: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>
  - School Breakfast Menus on the Web: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- School Breakfast should be promoted in the Back-to-School newsletter, monthly menus and throughout the year in the school newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### *Summer Food Service Program Outreach*

- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map at: <http://www.fns.usda.gov/capacitybuilder>.
- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. School Districts can inform families of summer meals via the following methods:
  - Promotion of the summer meals locator on the DPI Summer Meals website
  - Promotion of calling 211 to locate meals in the area
  - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area

- Promotion of the USDA Summer Food website  
<http://www.fns.usda.gov/summerfoodrocks>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD  
Summer Food Service Program Coordinator  
Phone: 608.266.7124  
e-mail: amy.kolano@dpi.wi.gov

### **Findings and Corrective Action Needed**

#### **Finding:**

The Nutrigrain Bar offered on the breakfast menu credited as less than 1 ounce equivalent (oz. eq.) of grain. This must be bundled with other items so that at least 1 oz. eq. of grain is offered each day, to meet the daily minimum for grain, and so these items can be counted as an item for breakfast meal pattern (defined by 1 oz. eq. grain, 1 oz. eq. meat, ½ cup of fruit/vegetable, and 1 cup of milk). If this item was paired with another 1 oz. eq. item, that would give a student access to 1.75 oz. eq. grain daily, for a weekly total of 8.5 oz. eq. grain. This would be a shortage for the week as a full 9 oz. eq. grain is required weekly at breakfast.

#### **Corrective Action Needed:**

Please submit a statement explaining what you will do to the week of review so that there is no weekly grain shortage when the Nutrigrain Bar is offered. **The Nutrigrain Bar will be taken off as a menu item and will only be offered as a la carte. There are many other 1 oz. eq. grain and/or 2 oz. eq. grain options offered at breakfast that can take the place of the Nutrigrain Bar. No further action required.**

#### **Finding:**

There was a shortage of beans/peas/legumes offered during the week of review. Although Garbanzo beans are put out daily, the planned serving size as stated on the production records is 1 Tbsp. This equates to 1/16<sup>th</sup> of a cup, which is less than the creditable amount for vegetables. A full ½ cup of beans/peas/legumes needs to be offered during the week. Please also make sure this is being recorded on the production records.

#### **Corrective Action Needed:**

Please state what you will do to the week of review so that a full ½ cup of beans/peas/legumes is offered. **Production records were updated so that the serving size for Garbanzo Beans on the salad bar is ¼ cup daily. This equates to 1 ¼ cup beans/peas/legumes for the week, exceeding the requirement. No further action required.**

#### **Finding:**

The menu that is available online states, “Fruit & Vegetable: up to 3 servings allowed from daily choices”. If, for example, the choices were ½ cup fruit, ½ cup fruit, ½ cup vegetable, and ½ cup vegetable, but students were only allowed three of those, this would not be meeting the meal pattern requirements. Under this verbiage, they would be limited to the amount of vegetables they could take, which needs to be ¾ cup or 1 cup, depending on the age/grade group. Students under the 9-12 meal pattern need to have access to a full cup of vegetables as well as a full cup of fruit. Students under the 6-8 meal pattern need to have access to a full ¾ cup of vegetables and a full ½ cup of fruit.

**Corrective Action Needed:**

Please update the wording on the menu so students are allowed to take the appropriate amount of fruits and vegetables for their respective age/grade groups' meal pattern. Please respond by February 24, 2017.

**Finding:**

Students at the High School paying cash in line for their reimbursable meal did not use a PIN for the transaction. This system does not insure the student was receiving a second reimbursable meal. Schools are only allowed to claim one reimbursable meal per student per day.

**Corrective Action Needed:**

Written statement confirming the Point Of Service procedures will be students entering their PIN for all reimbursable meal transactions. Please respond by February 24, 2017.

**Finding:**

New this school year is a requirement to complete the non-program revenue tool. This was reviewed with the Food Service Director which had already started on completing it.

**Corrective Action Needed:**

Finish a five day reporting period and review if the ratios are compliant. Please send a copy by February 24, 2017.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

